

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

In re: EDWARD F. TITUS)	
JESSICA A. TITUS)	
<u>Debtor(s)</u>)	CHAPTER 13
)	
AMERICREDIT FINANCIAL SERVICES, INC.)	Case No.: 18-17422 (JKF)
dba GM FINANCIAL)	
<u>Moving Party</u>)	
)	
v.)	11 U.S.C. 362
)	
EDWARD F. TITUS)	
JESSICA A. TITUS)	
<u>Respondent(s)</u>)	
)	
SCOTT F. WATERMAN)	
<u>Trustee</u>)	
)	

**CERTIFICATION OF DEFAULT BY DEBTORS IN VIOLATION OF STIPULATION
APPROVED ON OCTOBER 9, 2019 AND REQUEST FOR EX PARTE RELIEF FROM
THE AUTOMATIC STAY**

Comes AmeriCredit Financial Services, Inc. dba GM Financial ("GM Financial") filing this Certification of Default and ex parte request for relief from the automatic stay and hereby certifies;

1. That on October 9, 2019, the Court entered an Order approving a Stipulation providing for an arrearage cure, monthly payments to GM Financial, and for relief from the automatic stay under certain circumstances.
2. Paragraph three (3) of the Stipulation provides that the Debtors are to cure arrears by making their regular monthly payment of \$507.96 plus an additional \$596.12 (for a total monthly payment of \$1,140.08) for the months of September 2019 through February 2020.
3. Paragraph four (4) of the Stipulation provides that commencing September 2019, if the Debtors fail to make any payment within thirty (30) days after the date it falls due, GM Financial may file a Certification of Default with the Court and serve it on all interested parties. Five days after receipt of said Certification Of Default, the Court shall enter an Order granting relief from the automatic stay unless an objection has been filed, specifying the reasons for the objection; in which case the Court will set a hearing on the objection.

4. In violation of the Stipulation, the Debtors have made payments totaling just \$1,800.00 of the \$3,420.24 due per the Stipulation through November 2019, for a total default per the terms of the Stipulation through November in the amount of **\$1,620.24** (in addition, the payment of \$1,140.08 due for December 2019 fell due on December 15th and remains unpaid).
5. As a result of the defaults stated in paragraph four (4) of this Certification, GM Financial is entitled to stay relief a in regards to personal property described as a 2013 Jeep Wrangler bearing vehicle identification number 1C4AJWAG7DL609333.

Respectfully submitted:

/s/ William E. Craig

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dba GM Financial